

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI,
MARY BLY, MICHAEL CONNELLY, SYLVIA
DAY, JONATHAN FRANZEN, JOHN
GRISHAM, ELIN HILDERBRAND,
CHRISTINA BAKER KLINE, MAYA
SHANBHAG LANG, VICTOR LAVALLE,
GEORGE R.R. MARTIN, JODI PICOULT,
DOUGLAS PRESTON, ROXANA ROBINSON,
GEORGE SAUNDERS, SCOTT TUROW, and
RACHEL VAIL, individually and on behalf of
others similarly situated,

Plaintiffs,

v.

OPENAI INC., OPENAI LP, OPENAI LLC,
OPENAI GP LLC, OPENAI OPCO LLC,
OPENAI GLOBAL LLC, OAI CORPORATION
LLC, OPENAI HOLDINGS LLC, OPENAI
STARTUP FUND I LP, OPENAI STARTUP
FUND GP I LLC, and OPENAI STARTUP FUND
MANAGEMENT LLC,

Defendants.

JONATHAN ALTER, KAI BIRD, TAYLOR
BRANCH, RICH COHEN, EUGENE LINDEN,
DANIEL OKRENT, JULIAN SANCTON,
HAMPTON SIDES, STACY SCHIFF, JAMES
SHAPIRO, JIA TOLENTINO, and SIMON
WINCHESTER, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI,
LLC, OPENAI OPCO LLC, OPENAI GLOBAL
LCC, OAI CORPORATION, LLC, OPENAI
HOLDINGS, LLC, and MICROSOFT
CORPORATION,

Defendants.

CONSOLIDATED CASES:

No. 1:23-cv-08292-SHS

No. 1:23-cv-10211-SHS

No. 1:24-cv-00084-SHS

NICHOLAS A. BASBANES and NICHOLAS
NGAGOYEANES (professionally known as
Nicholas Gage), individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

MICROSOFT CORPORATION, OPENAI, INC.,
OPENAI GP, LLC, OPENAI HOLDINGS, LLC,
OAI CORPORATION, LLC, OPENAI GLOBAL,
LLC, OPENAI, L.L.C., and OPENAI OPCO, LLC

Defendants.

**DECLARATION OF TIFFANY CHEUNG IN SUPPORT OF
MOTION TO ADMIT COUNSEL *PRO HAC VICE***

I, Tiffany Cheung, declare as follows:

1. I am an attorney at law licensed to practice in the state of California. I submit this Declaration in support of the motion to admit me *pro hac vice* before the United States District Court for the Southern District of New York to represent Defendants OpenAI Inc., OpenAI OpCo LLC, OpenAI GP, LLC, OpenAI, LLC, OpenAI Global LLC, OAI Corporation, LLC, OpenAI Holdings, LLC, OpenAI Startup Fund I LP, OpenAI Startup Fund GP I LLC, and OpenAI Startup Fund Management LLC in the above-captioned action.

2. I am a member in good standing at the bar of the state of California. A true and correct copy of my certificate of good standing issued by the Supreme Court of California within the past 30 days is attached hereto. There are no pending disciplinary proceedings against me in any state or federal court.

3. Pursuant to Local Rule 1.3(c), I state:

a. I have never been convicted of a felony;

b. I have never been censured, suspended, disbarred or denied admission or readmission by any court; and

c. There are no disciplinary proceedings presently against me.

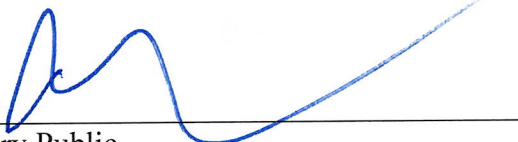
I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 22, 2024



Tiffany Cheung

Sworn and subscribed to before
me this 22nd day of August, 2024.



Notary Public

